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COMPLEX COMMERCIAL LITIGATION

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December 18, 2013

VIA ECF

The Honorable Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *The A Star Group Inc. v. Manitoba Hydro, et al.*, 13-cv-4501 (PAC)

Dear Judge Crotty:

We represent Plaintiff The A Star Group, Inc. ("AStar") in the above-referenced matter. Pursuant to Rule 3 of Your Honor's Individual Rules of Practice, we write to request a pre-motion conference in advance of filing a motion to withdraw pursuant to Local Civil Rule 1.4.

Rule 1.4 provides, in relevant part, that counsel may seek to withdraw upon the showing of "satisfactory reasons." Our substantial bases for this motion implicate attorney-client communications that are confidential and privileged, and, therefore, appropriately submitted *in camera* and under seal. *See* Committee Note to Loc. Civ. R. 1.4 ("This is not meant to preclude the Court from permitting the reasons for withdrawal to be stated *in camera* and under seal in an appropriate case.") For this reason, we further respectfully request permission to file our motion under seal, and that this action be stayed pending the outcome of this motion to allow AStar a reasonable opportunity to find substitute counsel. Pursuant to Rule 1.4, counsel will serve copies of this letter and any subsequent motion upon AStar.

We thank the Court for its consideration of this request.

Respectfully submitted,

s/ David S. Stone
David S. Stone

cc: Samantha Kumaran
CEO/President, The AStar Group, Inc.
All Attorneys of Record (via ECF)